

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**DEFENDANT SEWELL'S MOTION FOR A ONE DAY MODIFICATION OF
TERMS OF RELEASE ON BOND**

Now comes Defendant Terrance Sewell, by and through his attorney and moves this Court to set modify the terms of his release for one day for a period of six hours so that he can retrieve possessions from an apartment from which he has been evicted and take them to his sister's apartment. In support of this motion, Defendant states the following.

1. This Court placed Mr. Sewell on bond with one principal condition that he be on home incarceration. He is complying with the terms of his release.
2. Mr. Sewell has been evicted from the apartment he resided in before his arrest. He needs to go there, 900 W. Gunnerson so that he can retrieve his belongings and take them to his sister's apartment. He believes it will take him no longer than six hours to do so. He requests that the conditions of his release be modified to allow him to do this on March 13, 14 or 17. He will keep his Pretrial Services Officer advised of his whereabouts during this time period and will go to the apartment, get his belongings, take them to his sister's

apartment on Pulaski and Monroe.

3. Defendant does not yet know whether the Government will oppose this motion because AUSA Trivedi is unavailable until Tuesday.

WHEREFORE DEFENDANT Sewell prays that this Court grant his motion to allow him to retrieve his belongings on one of the days listed above. .

Respectfully submitted,

s/Steven Saltzman
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